

Message

From: Ramanauskas, Peter [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6492DDC4240C482B891D9F48B06E17F6-PRAMANAU]
Sent: 6/19/2017 2:14:29 PM
To: Polston, Patricia [polston.patricia@epa.gov]
Subject: RE: Follow up, Re: question about PCB remediation/closure

Thanks, Trish. So if this citizen has a concern with site characterization, it sounds like Brynn with the City would be the best contact to address the questions related to the concerns?

No fishing trips planned at this point, but am heading to Vegas this Saturday for a few days! Enjoy Eagle River. I miss heading up there for the fishing trips I used to go on.

Peter

From: Polston, Patricia
Sent: Tuesday, June 13, 2017 9:49 AM
To: Ramanauskas, Peter <ramanauskas.peter@epa.gov>
Subject: RE: Follow up, Re: question about PCB remediation/closure

Greetings Peter!

Things here are going...not sure where...

There was a Brownfield Assessment Agreement with the city of Madison, but it ended 9/30/2016. The only involvement we have with many of the assessments is just making sure the sites are eligible for our funding (no PRPs, etc.) and seeing that a Sampling and Analysis Plan is completed for Phase IIs. This agreement closed last year, the files usually go to the file room, but being a bit behind – I think I may still have these files here. I am attaching the final report that the City sent and it has some summary information that might be helpful.

Any decisions regarding the sites, would have come from the City. My contact there was:

Brynn Bemis, Hydrogeologist
City of Madison, Engineering Division
Room 115 City/County Building
210 Martin Luther King Jr. Blvd.
Madison, WI 53703
608-267-1986
bbemis@cityofmadison.com

Hope this helps.
Trish

Hey any fishing trips planned? We are heading up to Eagle River, WI area end of July.



Patricia J. Polston
Brownfields Project Manager
Brownfields & NPL Reuse Section #1
Land Revitalization Branch
Superfund Division / US EPA, Region 5
77 W. Jackson Blvd SB-5J
Chicago, IL 60604
312-886-8093

From: Ramanauskas, Peter
Sent: Tuesday, June 13, 2017 9:24 AM
To: Polston, Patricia <polston.patricia@epa.gov>
Subject: FW: Follow up, Re: question about PCB remediation/closure

Hi Trish!

Hope you've been doing well. I received this email from a citizen in Madison and noticed your name on the cc for the attached Phase 2 ESA. Are you currently involved with this project? The citizen has some questions about the potential to sample for PCB within the building so I wanted to reach out to you first to see if you're still involved with anything here.

Thanks!
Peter

From: Maria Powell (MEJO) [<mailto:mariapowell@mejo.us>]
Sent: Thursday, June 08, 2017 1:49 PM
To: Ramanauskas, Peter <ramanauskas.peter@epa.gov>
Subject: Re: Follow up, Re: question about PCB remediation/closure

Peter:

Mike's response is very familiar. In February 2012, we and some of our community collaborators asked Mike Schmoller why they hadn't tested for PCBs at Kipp and suggested that they do so (as citizens had since the 90s). He told us, in no uncertain terms, that he had no reason to believe there would be PCBs there. Of course, one month later (March 2012), significant levels of PCBs were found there when they were digging to build the SVE system. You know the rest of the story.

So, we are skeptical of DNR's claims that there are no contaminants inside the Brassworks building when there has been no testing. There was some testing of soils there, and significant levels of PAHs and metals were found (see attached, beginning pg. 12). PCBs (7 aroclors) were tested in 3 locations and all were under detection limits. This seems like far too few samples to rule out PCBs.

The soils will be removed/remediated, but what about the building? Given that the Brassworks building will be used for programs for children run by the Goodman Center, it seems imperative that building materials be tested.

Can you suggest any way that citizens could request that this testing be done, other than asking the DNR (which

will say no)?

Thanks,
Maria

On 6/8/2017 8:01 AM, Maria Powell (MEJO) wrote:

Thanks, Mike.

As you know, brass and other metal foundries commonly involved the use of PCBs.

Anyway, I will assume (unless you say otherwise) that no other contaminants were tested inside the building either (metals, etc) before the art show and public open houses in coming days.
http://host.madison.com/wsj/news/local/forged-exhibit-to-meld-art-and-madison-history/article_c72d0acd-85ef-553c-8652-f5f894a9ce00.html

As far as I know, there has been no remediation yet in the building. I hope the artists didn't pound into contaminated materials as they set up their exhibits.

Maria

On 6/7/2017 12:30 PM, Schmoller, Michael R - DNR wrote:

Maria

I do not believe there was interior sampling for PCBs at the Brassworks site. I do not think there was anything in the site history that suggested that PCBs would be present inside the building.

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

R. Michael Schmoller

Phone: 608-275-3303

Michael.schmoller@wisconsin.gov

From: Maria Powell (MEJO) [<mailto:mariapowell@mejo.us>]

Sent: Tuesday, June 06, 2017 2:18 PM

To: Ramanauskas, Peter

Cc: Schmoller, Michael R - DNR

Subject: Follow up, Re: question about PCB remediation/closure

Hello again,

Just a reminder--Mike, I'm hoping you can address my questions below.

Expanding a bit on the 2nd question--can you tell me if any contaminant testing (PCBs or anything else) was done on materials inside the Brassworks building? Right now artists are in there working on sculptures and other art for a public open house this weekend.

Thank you,
Maria

On 5/30/2017 8:40 AM, Maria Powell (MEJO) wrote:

Peter--

Thanks--this is helpful.

A few years ago I copied everything in the Goodman file, including the 2005 documents. I didn't see any maps or data on the Goodman PCB soil sampling. **Mike, did I miss it--and if so, can you share it?**

Thank you for informing the Goodman leaders about proper management of the PCB contaminated materials. On a related note--**Mike, will Goodman be expected to test for PCBs in materials in the Brassworks building that they will be refurbishing soon for their center expansion?**

Thanks, I appreciate the responses.

Maria

On 5/26/2017 3:38 PM, Ramanauskas, Peter wrote:

Hello Maria,

For old industrial properties, sometimes there is little information available on what PCB sources might have been. Section 2.1.5 of the October 2008 Closure Request that you sent me references the September 2005 PCB soil sampling requested by WDNR and indicates there was an August 2005 report and a September 2005 report attachment submitted. Do you have copies of those? If not, please request the information from Mike Schmoller with WDNR (cc'd here) as I imagine those documents

would contain the information on the soil sampling that you are interested in, including information about suspected PCB sources.

As to your question about responsibility for proper management of PCBs should they perform reconstruction/renovation that may affect residually impacted areas, the Goodman Center as the property owner is responsible for proper management of regulated PCB. To that end, we will contact the Goodman Center to inform them of such responsibility.

Thanks,
Peter

-----Original Message-----

From: Maria Powell (MEJO)
[mailto:mariapowell@mejo.us]
Sent: Thursday, May 25, 2017 9:26 AM
To: Ramanauskas, Peter
<ramanauskas.peter@epa.gov>
Subject: Re: question about PCB
remediation/closure

Peter,

Thank you.

Yes, I know they tested four soil samples for PCBs. As I said below, there are no maps of where they took these four samples and this soil PCB data is not in the files. So we know nothing about where they tested, what they tested, what the detection limits were, etc. There is nothing in any of the reports suggesting that they identified what the sources of PCBs were, where they were, etc.

How can you appropriately assess and remediate a site without knowing the source of the contaminants and how they were used, pathways of release, etc? I believe Wisconsin's NR 700 rules require some of this, but these rules are rampantly ignored at sites in south central Wisconsin. Consequently, we have situations like Madison Kipp--where the PCBs were "discovered" in 2012, after citizens raised questions about them for decades but DNR said they weren't there because they never tested for them. Goodman, of course, has children playing all over it, so the stakes are even higher.

One further question: What entity is responsible to assure that when Goodman does reconstruction inside the building,

they handle the PCBs appropriately? The DNR? Goodman? The contractors?

Thanks,
Maria

On 5/24/2017 2:24 PM, Ramanauskas, Peter wrote:

Hello Ms. Powell,

I did look over the information you provided to Gary & me. Given the low PCB levels detected in the building, it appears that the remedial actions taken were appropriate (i.e. capping of the residual in the original floor by approximately 20 inches of new concrete underlain with gravel and the removal, cleaning, and/or encapsulation/marking of remaining building columns). Although the owner considered the federal PCB cleanup regulations in the actions they took to address the contamination found in the building materials that exceeded 1 mg/kg, because the as-found concentrations of PCB did not exceed 50 mg/kg, they may not have notified U.S. EPA in light of the regulatory language at 40 CFR 761.50(b)(3). I see that WDNR did request the collection of four soil samples for PCB analysis which resulted in non-detects. Sampling is usually biased to suspected source areas, in this case visibly oil stained areas. Various Federal PCB Policies and Guidance documents may be found here:
<https://www.epa.gov/pcbs/policy-and-guidance-polychlorinated-biphenyl-pcbs>

Please let me know if you have additional questions.

Regards,
Peter

-----Original Message-----
From: Maria Powell (MEJO)
[mailto:mariapowell@mejo.us]
Sent: Monday, May 22, 2017
8:16 AM
To: Ramanauskas, Peter
<ramanauskas.peter@epa.gov>
Subject: Re: question about
PCB remediation/closure

Hi Peter:

I just heard that the Goodman Center is planning to do some remodeling in the building referred to below--and it reminded me of our exchanges. Any chance to look the information over yet?

Thanks,
Maria

On 5/10/2017 9:52 AM, Maria Powell (MEJO) wrote:

FYI, in case you don't already know this, the Goodman Community Center is directly adjacent to Madison Kipp, to the north.

On 5/10/2017 9:39 AM, Maria Powell (MEJO) wrote:

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